

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:16-ct-03018-FL

MICHAEL L. KREMBEL,)	
)	
Plaintiff,)	
)	
v.)	MOTION FOR PROTECTIVE ORDER
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

This is a Federal Tort Claims Act ("FTCA") action arising out of the Bureau of Prison's treatment and scheduling for treatment of Plaintiff concerning his squamous cell carcinoma ("SCC"). As part of the documents material to the merits of this case, Defendant wishes to disclose relevant portions of the contract between Defendant and UMass Medical School subject to a protective order.

Upon information and belief, the contract proposal and award contain proprietary language not generally subject to disclosure to the public. To facilitate the production and receipt of the relevant portions of the contract between Defendant and UMass Medical School, the parties have consented, through their respective counsel, to the entry of a Protective Order for the protection of said documents, Bates Stamped 18191-18242, for

disclosure of same to Plaintiff. Plaintiff has no objection to this motion.

Defendant hereby files this motion with the Proposed Protective Order attached hereto and respectfully requests the Court's entry of said Protective Order.

Respectfully submitted this 16th day of February, 2018.

By: /s/ Rudy E. Renfer
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CERTIFICATE OF SERVICE

I do hereby certify that I have this 16th day of February, 2018, served a copy of the foregoing electronically filing the foregoing with the Court on this date using the CM/ECF system and/or by placing a copy of the same in the U.S. Mail addressed as follows:

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